



414 Nicollet Mall
Minneapolis, MN 55401

March 12, 2015

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: COMMENTS
ELECTRIC VEHICLE CHARGING TARIFF
DOCKET NO. E002/M-15-111

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the attached Comments in response to the Minnesota Public Utilities Commission's Notice of Comment Period dated February 10, 2015.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies of these Comments on the parties on the attached service list. If you have any questions regarding this filing please contact me at (612) 330-5953 or cynthia.d.harrington@xcelenergy.com.

Sincerely,

/s/

CYNTHIA D. HARRINGTON
REGULATORY CASE SPECIALIST

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF A RESIDENTIAL
ELECTRIC VEHICLE CHARGING TARIFF

DOCKET No. E002/M-15-111

COMMENTS

COMMENTS

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments in response to the Commission's February 10, 2015 Notice of Comment Period on Electric Vehicle (EV) Charging Tariffs.

A. Compliance with EV Tariff Legislation

As we noted in our initial Petition, our proposed EV charging tariff was submitted in compliance with Minnesota Statute §216B.1614. Our compliance with the EV tariff legislation is documented in a Compliance Matrix, which was included as Attachment A to our EV Rate Design Petition filed on January 30, 2015.

B. On- and Off-Peak Hours Designation

Utilities have different hourly resource costs that should serve as the basis for the designated on- and off-peak hours in the EV tariff, consistent with tariffs with rates that vary by time-of-day. We believe it is appropriate and economically efficient to recognize these differences by not requiring all utilities to share the same on- and off-peak hours for their EV tariff.

C. Calculation of Renewably-Sourced Electricity Rate

In compliance with the legislation, our filing included an option for customers to purchase electricity from the utility's current mix of energy supply sources or entirely from renewable energy sources. We used our Voluntary Renewable and High-

Efficiency Energy Purchase Rider (Windsorce program) as the source of that energy supply option, which uses a Commission-approved renewable energy rate.¹

D. Metering

We interpreted the legislation to require separate metering or submeters, consistent with its requirement to incorporate that cost within the tariff and to provide the information to fulfill its reporting requirement for the amount electricity sold under the tariff. Therefore we proposed in our Petition that service through this rate shall be separately metered through a sub-meter installed behind the customer's main meter. The cost for the meter is fixed and would be covered through a monthly Customer Charge, which we proposed to be \$4.95 for the EV tariff. This amount is the consistent with what was established for two other existing rate options for residential customers that have the same incremental metering and billing cost requirements.²

E. Compliance Reporting

We proposed an annual compliance filing by the end of the first quarter of the year proceeding the Commission's Order on the status of this rate offering. In the interest of consistency and ease of processing, we could coordinate with other utilities on the reporting process and timeline.

We suggested including in this report the number of customers participating in the rate, kWh sales by on- and off-peak hours, the number of customers choosing the renewable option, the status of the communications costs tracker account, and any other data required by the Commission.

CONCLUSION

We appreciate the opportunity to provide written comments on the Commission's Notice. The Company requests that the Commission consider these Comments when it deliberates on this matter.

Dated: March 12, 2015

Northern States Power Company

¹ Docket No. E002/M-01-1479, Minnesota Electric Rate Book, MPUC No. 2, Section 5, Sheet Nos. 134 – 134.1

² Energy Controlled Service (Non-Demand Metered) and Limited Off Peak Service, which both provide separate metering and billing for specific electric loads at energy rates that differ from the Residential Service tariff. Minnesota Electric Rate Book, MPUC No. 2, Section 5, Sheet Nos. 9 – 10.1, Section 5, Sheet Nos. 11 – 12, and Section 5, Sheet Nos. 1 – 1.1, respectively.

CERTIFICATE OF SERVICE

I, Tiffany Hughes, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota; or

xx by electronic filing.

MPUC Docket No: E002/M-15-111

Dated this 12th day of March 2015.

/s/

Tiffany Hughes

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_15-111_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-111_Official
Alison C	Archer	alison.c.archer@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-111_Official
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-111_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-111_Official
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_15-111_Official
Tiffany	Hughes	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-111_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_15-111_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_15-111_Official
Thomas G.	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_15-111_Official
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_15-111_Official
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_15-111_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-111_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-111_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-111_Official
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-111_Official
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-111_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-111_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_15-111_Official